

7-89-156

TO: ☐ JEANNE ☐ JAY ☐ OTHER: _____ FROM: J.Pritchard
☐ LYNN ☐ BARBARA
☐ JEANETTE ☐ ALICE
☐ HELEN ☐ MARY ANN
 ☐ CARLA

DATE: 5/10/84

☒ TELEPHONE ADVICE - SEE BELOW

☐ CORRESPONDENCE ADVICE - SEE ATTACHED DRAFT

(IF YOU HAVE ANY COMMENTS, NOTIFY ADVISOR WITHIN 1 DAY)

FILE LOCATION: Sections 86107 and 86109

INCLUDE IN ADVICE PACKAGE: YES ☒ NO ☐

CALLER Rob Oglesby
REPRESENTING Orrick, Herrington
PHONE NUMBER: 447-7752

QUESTION: Orrick, Herrington, a retained entity, provided pro bono
lobbying services to a charitable organization. Is the
charitable organization required to file reports as an employer
of a lobbyist? Must the lawfirm report the payments to its
lobbyist for the services provided on behalf of the charitable
organization?

ANSWER: The charitable organization is not required
to file reports as an employer because it did not make payments.
The lawfirm and its lobbyist must report the payments from the
lawfirm to the lobbyist for the services provided on behalf of
the charitable organization. In addition, the lawfirm and the
lobbyist must report in Part I of their quarterly reports the
legislative and administrative actions they attempted to influence
on behalf of the charitable organization. I suggested that they
also indicate which actions they lobbied on behalf of the
charitable organization and indicate that it was pro bono work.